

JAP:RTP

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M 12 393

- - - - - X
UNITED STATES OF AMERICA

C O M P L A I N T

- against -
DENICE CLARKE,

Defendant.

- - - - - X
EASTERN DISTRICT OF NEW YORK, SS:

GERARD MCMAHON, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about March 25, 2012, within the Eastern District of New York and elsewhere, the defendant DENICE CLARKE did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:¹

1. On or about March 25, 2012, the defendant DENICE CLARKE arrived at John F. Kennedy International Airport ("JFK") in Queens, New York, aboard Caribbean Airlines Flight No. 524 from Georgetown, Guyana.

2. The defendant DENICE CLARKE was selected for a Customs and Border Protection ("CBP") examination. The defendant presented for inspection one black "Premium" carry-on suitcase. The defendant claimed ownership of the suitcase and its contents.

3. During questioning, the defendant DENICE CLARKE seemed very nervous and was very talkative. During an inspection of her suitcase, a CBP officer observed that the top of the suitcase felt unusually heavy. A probe of the suitcase revealed a white-powdery substance, which field-tested positive for the presence of cocaine.

4. The total approximate gross weight of the cocaine found in the defendant DENICE CLARKE's suitcase is 2,128.4 grams.

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

WHEREFORE, your deponent respectfully requests that defendant DENICE CLARKE be dealt with according to law.

GERARD MCMAHON
Special Agent
Homeland Security Investigations

Sworn to before me this
26th day of March, 2012

THE H:
UNITE:
EASTE:

S/Reyes

YES, JR.
JUDGE
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